

James H. Fleming (SBN 042226)  
Linda B. Oliver (SBN 166720)  
REED SMITH LLP  
1999 Harrison Street, Suite 2400  
Oakland, CA 94612-3572

**Mailing Address:**

P.O. Box 2084  
Oakland, CA 94604-2084

OK/HAV

Telephone: 510.763.2000  
Facsimile: 510.273.8832

Attorneys for Defendant  
Massachusetts Mutual Life Insurance  
Company

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

JOHN C. ROBINSON,

Plaintiff,

vs.

MASSACHUSETTS MUTUAL LIFE  
INSURANCE COMPANY, SUCCESSOR IN  
INTEREST TO CONNECTICUT MUTUAL  
LIFE INSURANCE COMPANY, and DOES 1  
through 20, inclusive,

Defendants.

No.: CIV. S-04-1684 DFL KJM

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING DATES SET IN  
STATUS (PRE-TRIAL SCHEDULING)  
ORDER**

IT IS HEREBY STIPULATED by and between the parties hereto, through their  
respective attorneys of record, as follows:

1. The Court's Status (Pre-trial Scheduling) Order dated October 25, 2004, set  
the following dates:

- a. Discovery cut-off date: April 29, 2005;
- b. Last day to file dispositive motions: June 1, 2005;
- c. Hearing on dispositive motions: July 13, 2005, 10:00 a.m.;
- d. Final pre-trial conference: August 26, 2005, 3:00 p.m., with joint pretrial  
statement due no later than seven days before the conference; and

No.: CIV. S-04-1684 DFL KJM

- 1 -

DOCSOAK-9772186.1-LOLIVER

STIPULATION AND [PROPOSED] ORDER CONTINUING DATES SET IN STATUS (PRE-TRIAL  
SCHEDULING) ORDER

e. Trial date: October 3, 2005, 9:00 a.m.

2. The parties respectfully request that the Court issue an order extending these deadlines so the parties have time to complete a mediation before incurring the expense of completing all fact and expert discovery, as follows:

a. Discovery cut-off date: July 28, 2005;

b. Last day to file dispositive motions: September 7, 2005;

c. Hearing on dispositive motions: October 5, 2005, 10:00 a.m.;

d. Final pre-trial conference: November 16, 2005, 4:00 p.m., with joint pretrial statement due no later than seven days before the conference; and

e. Trial date: December 12, 2005, 9:00 a.m.

3. The parties have not made any previous request for an extension of time for these dates.

DATED: May 2, 2005

REED SMITH LLP

By /s/  
Linda B. Oliver  
Attorneys for Defendant Massachusetts Mutual  
Life Insurance Company

DATED: May 2, 2005

LAW OFFICE OF JOHN M. RIESTENBERG

By /s/  
John M. Riestenberg  
Attorneys for Plaintiff John C. Robinson

IT IS SO ORDERED.

Dated: 5/3/2005

/s/ David F. Levi  
DAVID F. LEVI  
United States District Judge